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March 3, 2020

Via Electronic Filing

The Honorable Magistrate Judge Sarah Netburn
U.S. District Court Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Doncouse v. Matto MGMT NY LLC et al*
Case No.: 1:19-cv-2801

Dear Honorable Magistrate Judge Netburn:

This law firm is counsel to Defendants Matto Mgmt NY LLC and Matto Franchise LLC (collectively, the “**Defendants**”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 1(g), this letter respectfully serves as a request to adjourn the discovery conference scheduled for March 6, 2020 at 3:30 p.m., to Wednesday, March 18, 2020 at 12:00 p.m. (*i.e.* on the date of the upcoming Case Management Conference). This is the first request for an adjournment of the discovery conference. Plaintiff’s counsel has not responded to a request to consent this application. This adjournment would not affect any other scheduled deadlines.

The basis for the request is that the undersigned has a deposition scheduled in the matter captioned *Sepideh Nabatian v. NY Medical Health Care, P.C. et al* [Case No.: 707975-2019]. In addition, the parties are conferring regarding the instant discovery dispute, and wish to resolve the issue without necessitating Court intervention.

In light of the foregoing, Defendants respectfully request that the discovery conference scheduled for March 6, 2020 at 3:30 p.m., be adjourned to Wednesday, March 18, 2020 at 12:00 p.m. (*i.e.* on the date of the upcoming Case Management Conference).

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel